

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

HOWARD WASHINGTON AZ6407  
(Name of Plaintiff)  
CALIFORNIA STATE PRISON (SAC)  
(Address of Plaintiff)  
P.O. Box 290066 / REPRESA CALIF. 95671

2:22-cv-2272-DMC (PC)  
(Case Number)

vs.

COMPLAINT

MESKATH UDDIN, M.D. AND  
JEFF LYNCH, WARDEN.  
  
(Names of Defendants)

I. Previous Lawsuits:

A. Have you brought any other lawsuits while a prisoner: ☐ Yes ☒ No

B. If your answer to A is yes, how many?: N/A Describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff N/A  
Defendants N/A

2. Court (if Federal Court, give name of District; if State Court, give name of County)

N/A

3. Docket Number N/A

4. Name of judge to whom case was assigned N/A

5. Disposition (For example: Was the case dismissed? Was it appealed? Is it still pending?)

N/A

6. Approximate date of filing lawsuit N/A

7. Approximate date of disposition N/A

## II. Exhaustion of Administrative Remedies

A. Is there a grievance procedure available at your institution? ☐ Yes ☐ No

B. Have you filed a grievance concerning the facts relating to this complaint?

☐ Yes ☐ No

If your answer is no, explain why not N/A

C. Is the grievance process completed?

☒ Yes ☐ No

## III. Defendants

(In Item A below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item B for the names, positions and places of employment of any additional defendants.)

A. Defendant MESKATH UDDIN, M.D. is employed as A MEDICAL DOCTOR at CALIFORNIA STATE PRISON (SAC)

B. Additional defendants JEFF LYNCH, WARDEN IS EMPLOYED AS WARDEN AT CALIFORNIA STATE PRISON (SAC)

IV. Statement of Claim

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach extra sheets if necessary.)

DEFENDANT MESKATH UDDIN WAS DELIBERATE INDIFFERENCE TO PLAINTIFF WASHINGTON'S SERIOUS MEDICAL NEED WHEN HE FAILED TO RESPOND REASONABLY TO PLAINTIFF'S RISK OF LOSING HIS EYE SIGHT, WHICH PLAINTIFF EVENTUALLY DID LOSE DUE TO DEFENDANT'S LACK OF ACTIONS AND NEGLIGENCE.

V. Relief.

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

Signed this <sup>20</sup>~~17~~ day of Dec, 20 22

  
(Signature of Plaintiff)

I declare under penalty of perjury that the foregoing is true and correct.

<sup>20</sup>~~12~~47 22  
(Date)

  
(Signature of Plaintiff)

**CLAIM ~~III~~ II**

1. State the constitutional or other federal civil right that was violated: DUE PROCESS UNDER THE EIGHTH AMENDMENT TO THE U.S. CONSTITUTION
2. **Claim III.** Identify the issue involved. Check **only one**. State additional issues in separate claims.
- |  |   |  |  |
|--|---|--|--|
| <input type="checkbox"/> Basic necessities             | <input type="checkbox"/> Mail             | <input type="checkbox"/> Access to the court                   | <input checked="" type="checkbox"/> Medical care |
| <input type="checkbox"/> Disciplinary proceedings      | <input type="checkbox"/> Property         | <input type="checkbox"/> Exercise of religion                  | <input type="checkbox"/> Retaliation             |
| <input type="checkbox"/> Excessive force by an officer | <input type="checkbox"/> Threat to safety | <input type="checkbox"/> Other: <u>DELIBERATE INDIFFERENCE</u> |  |
3. **Supporting Facts.** State as briefly as possible the FACTS supporting Claim III. Describe exactly what each Defendant did or did not do that violated your rights. State the facts clearly in your own words without citing legal authority or arguments.
- DEFENDANT JEFF LYNCH IS THE WARDEN AT CALIFORNIA STATE PRISON (SAC).  
HE IS LEGALLY RESPONSIBLE FOR THE OPERATIONS OF C.S.P. (SAC), AND FOR THE WELFARE OF ALL THE INMATES IN THAT PRISON AND ALL THE STAFF WHO WORK AT C.S.P. (SAC).  
HE IS LEGALLY RESPONSIBLE FOR PLAINTIFF BEING ASSAULTED WHEN HIS STAFF WAS 'DELIBERATE INDIFFERENCE' TO PLAINTIFF HOWARD WASHINGTON, WHEN THEY WERE PERSONALLY AWARE OF PLAINTIFF'S LIVING SITUATION WITH HIS CELL MATE, BUT FAILED TO RESPOND REASONABLY TO PROTECT HIM FROM HARM AND AS A RESULT, PLAINTIFF WAS ASSAULTED AND LOSS HIS SIGHT.  
DEFENDANT JEFF LYNCH, WARDEN, FAILED TO ADEQUATELY TRAIN OR SUPERVISE HIS SUBORDINATES.
4. **Injury.** State how you were injured by the actions or inactions of the Defendant(s).
- STAFF WERE AWARE OF PLAINTIFF'S LIVING SITUATION WITH CELL MATE. PROMISED TO MOVE PLAINTIFF, BUT DIDN'T. AFTER PLAINTIFF'S EYE SURGERY AND THE DAY HE WAS TO MOVE WITH INMATE UNDERWOOD, 2 1/2 WEEKS AFTER HIS REQUEST TO MOVE TO ANOTHER CELL, HE WAS ATTACKED.
5. **Administrative Remedies.**
- Are there any administrative remedies (grievance procedures or administrative appeals) available at your institution? ☒ Yes ☐ No
  - Did you submit a request for administrative relief on Claim ~~III~~ <sup>II</sup>? ☒ Yes ☐ No
  - Did you appeal your request for relief on Claim ~~III~~ <sup>II</sup> to the highest level? ☒ Yes ☐ No
  - If you did not submit or appeal a request for administrative relief at any level, briefly explain why you did not. NA

If you assert more than three Claims, answer the questions listed above for each additional Claim on a separate page.

**E. REQUEST FOR RELIEF**

State the relief you are seeking:

A. AN OMISSION THAT PLAINTIFF'S RIGHTS WERE VIOLATED.

B. COMPENSATORY DAMAGES IN THE AMOUNT OF \$150,000.00.

C. PUNITIVE DAMAGES IN THE AMOUNT OF \$150,000.00 AND

D. TRANSFER TO A MEDICAL FAC. THAT PROVIDE PROPER EYE CARE.

I declare under penalty of perjury that the foregoing is true and correct:

Executed on 12<sup>30</sup> / 12 / 22  
DATE

[Signature]  
SIGNATURE OF PLAINTIFF

\_\_\_\_\_  
(Name and title of paralegal, legal assistant, or  
other person who helped prepare this complaint)

\_\_\_\_\_  
(Signature of attorney, if any)

\_\_\_\_\_  
(Attorney's address & telephone number)

**ADDITIONAL PAGES**

All questions must be answered concisely in the proper space on the form. If you need more space you may attach more pages, but you are strongly encouraged to limit your complaint to twenty-five pages. If you attach additional pages, be sure to identify which section of the complaint is being continued and number all pages. Remember, there is no need to attach exhibits to your complaint.



1 HOWARD WASHINGTON  
2 P.O. Box 290066 / C.S.P. (Sac)  
3 REPRESA CALIF. 95671  
4 C.D.C.R. No. AZ6407  
5

6 IN THE UNITED STATES DISTRICT COURT  
7 FOR THE EASTERN DISTRICT OF CALIFORNIA  
8

9 HOWARD WASHINGTON,  
10 PLAINTIFF,

11 V.

12 MESKATH UDDIN, M.D.,  
13 J. LYNCH, WARDEN,  
14 DEFENDANTS.

CASE No.

CIVIL RIGHTS COMPLAINT

JURY TRIAL DEMANDED

15 I. JURISDICTION AND VENUE

16 1. THIS IS A CIVIL ACTION AUTHORIZED BY 42 U.S.C. SECTION 1983 TO REDRESS  
17 THE DEPRIVATION, UNDER COLOR OF STATE LAW, OF RIGHTS SECURED BY THE CONSTITUTION  
18 OF THE UNITED STATES. THE COURT HAS JURISDICTION UNDER 28 U.S.C SECTION 1331  
19 AND 1343 (a)(3).

20 2. THE EASTERN DISTRICT OF CALIFORNIA IS AN APPROPRIATE VENUE UNDER 28  
21 U.S.C. SECTION 1391 (b)(2) BECAUSE IT IS WHERE THE EVENTS GIVING RISE TO  
22 THESE CLAIMS OCCURRED.

23 II. PLAINTIFFS

24 3. PLAINTIFF, HOWARD WASHINGTON, IS AND WAS AT ALL TIMES MENTIONED  
25 HEREIN A PRISONER OF THE STATE OF CALIFORNIA IN THE CUSTODY OF THE CALIF.  
26 - ORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION. HE IS  
27 CURRENTLY CONFINED IN CALIFORNIA STATE PRISON (SACRAMENTO) IN REPRESA,  
28 CALIFORNIA.

### III. DEFENDANTS

4. DEFENDANT, JEFF LYNCH, IS THE WARDEN OF CALIFORNIA STATE PRISON (SAC). HE IS LEGALLY RESPONSIBLE FOR THE OPERATIONS OF CALIFORNIA STATE PRISON (SAC) AND FOR THE WELFARE OF ALL THE INMATES IN THAT PRISON.

5. DEFENDANT, MESKATH UDDIN, IS AN EMPLOYEE OF THE CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION AS A MEDICAL DOCTOR (M.D.), AT CALIFORNIA STATE PRISON (SAC), IN REPRESA CALIFORNIA.

6. EACH DEFENDANT IS SUED INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY. AT ALL TIMES MENTIONED IN THIS COMPLAINT EACH DEFENDANT ACTED UNDER THE COLOR OF STATE LAW.

### IV. FACTS

7. ON AUGUST 4, 2020, GREGORY C. TESLUK, M.D., PERFORMED A CATARACT AND IMPLANT SURGERY ON PLAINTIFF HOWARD WASHINGTON, UNDER A TOPICAL ANESTHETIC AS AN OUTPATIENT AT MODESTO SURGERY CENTER. (SEE EXHIBIT A.).

8. ON AUGUST 4, 2020, GREGORY C. TESLUK, M.D., WROTE DOCTOR BRITTANY BRIZENDINE, AT CALIFORNIA STATE PRISON (SAC), EXPRESSING HIS RECOMMENDATIONS FOR PLAINTIFF HOWARD WASHINGTON'S MEDICATION(S) AND DOCTOR APPOINTMENTS AND FUTURE PLANS FOR FURTHER TREATMENT FOR PLAINTIFF. (SEE EXHIBIT A. (LETTER)).

9. ON AUGUST 5, 2020, DR. TESLUK, SUBMITTED INSTRUCTIONS AFTER PLAINTIFF'S EYE SURGERY FOR PLAINTIFF TO BEGAN MEDICATIONS, TO BEGAN USE DAY OF SURGERY (SEE EXHIBIT B. (INSTRUCTIONS)).

10. ON AUGUST 6, 2020, DR. TESLUK, SAW PLAINTIFF WASHINGTON AGAIN FOR A CHECK UP TWO DAYS AFTER SURGERY AT MODESTO SURGERY CENTER AND INFORMED DR. BRIZENDINE, OF HIS EVALUATION AND MADE RECOMMENDATIONS IN THE FURTHERING PLAINTIFF'S CARE AND RECOVERY.



(SEE EXHIBIT C. (LETTER TO DR. BRIZENDINE)).

11. ON AUGUST 9, 2020, PLAINTIFF HOWARD WASHINGTON, WAS ADMITTED TO U.C. DAVIS MEDICAL CENTER FOR SUDDEN LEFT EYE VISION LOSS AFTER BEING ASSAULTED TO HIS LEFT EYE BY HIS THEN CELL MATE, JASON BURNS. AND UNDERWENT COMPLEX RETINAL DETACHMENT REPAIR. (SEE EXHIBIT D. (U.C. DAVIS ADMISSION RECORDS)).

12. PLAINTIFF REMAINED HOSPITALIZED FOR (8) DAYS AND DISCHARGED ON AUGUST 17, 2020. (SEE EXHIBIT E.).

13. PRIOR TO PLAINTIFF BEING ASSAULTED, HE AND HIS CELL MATE, INMATE JASON BURNS, WERE HAVING ISSUES OF INDIFFERENCE AND PLAINTIFF SOUGHT HELP FROM STAFF IE, CORRECTIONAL OFFICER I. OGBEIDE, WERE TO MOVE PLAINTIFF WITH INMATE A. UNDERWOOD C 63387, WHO WAS HOUSE IN F.C. 4-129 ALONG AT THAT TIME. HOWEVER, C.O. I. OGBEIDE REFUSED TO MOVE ME. (SEE EXHIBIT F. (DECLARATION)).

14. PLAINTIFF ALSO SOUGHT HELP FROM CORRECTIONAL OFFICER BAUWER, WHO WAS THE LEAD FLOOR STAFF IN F.C. 3-BLOCK. HE WAS / IS FULLY AWARE OF MY CELL MATE'S AND MY LIVING SITUATION. PLAINTIFF EXPLAINED TO OFFICER BAUWER THAT INMATE JASON BURNS AND HE WERE NOT COMPATIBLE. C.O. BAUWER, KEPT INFORMING PLAINTIFF THAT HE WOULD SEPARATE HE AND HIS CELL MATE THE FOLLOWING WEEK. HOWEVER, INMATE J. BURNS, ASSAULTED PLAINTIFF THE DAY HE WAS GOING TO MOVE. (SEE EXHIBIT G. (DECLARATIONS)).

15. PLAINTIFF WASHINGTON HAD BEGAN STRESSING TO THE DEGREE THAT HE FOUND COMFORT TALKING TO R.N. GEORGIA AND THE PRISON'S PSYCHOLOGIST DR. DAVIS. BOTH IS FULLY AWARE OF PLAINTIFF'S CELL SITUATION WITH HE CELL MATE. (SEE EXHIBIT H. (DECLARATION)).



16. ON AUG. 18, 2020, THE PRESSURE WENT UP IN PLAINTIFF'S LEFT EYE AND CAUSED PLAINTIFF EXTREME PAIN AND DISCOMFORT.

17. PLAINTIFF COMPLAINED TO DR. UDDIN ABOUT HIS PAIN AND DR. UDDIN RESPONDED BY CUTTING PLAINTIFF'S MEDICATIONS OFF AND ON WHICH CAUSED PLAINTIFF TO SUFFER IN BETWEEN TIMES.

18. UPON PLAINTIFF'S DISCHARGE AUG. 17, 2020, DR. CHU, WENDY DENISE, M.D., CONDUCTED A SUMMARY DISCHARGE ON PLAINTIFF AND RECOMMENDED THAT THE FOLLOWING MEDICATIONS BE GIVEN TO PLAINTIFF AT THE PRISON, I.E. OCUFLOY DROPS BID TO LEFT EYE, PREDNISOLONE ACETATE 1% BID TO LEFT EYE, DORZOLMAIDE - TIMOLOL DROPS BID TO LEFT EYE, BRIMONIDINE DROPS TID TO LEFT EYE AND LATANOPROST OHS TO BOTH EYES. (SEE EXHIBIT E, DISCHARGE SUMMARY NOTE).

19. PLAINTIFF WAS GIVEN A SCHEDULED MEDICATION THE DAY OF HIS DISCHARGE. (SEE EXHIBIT E.).

20. ON AUG. 21, 2020, PLAINTIFF WENT TO AN OFFICE VISIT AT UIC DAVIS HEALTH SYSTEM EYE CENTER, TO SEE DOCTOR DENIER, MATTHEW ON AUG. 22, 2020 AT 7:19 P.M., DOCTOR KIM WAS PRESENT FOR THE PROCEDURE (SEE EXHIBIT K, PAGE 2).

21. AFTER DOCTOR DENIEAR, PROFORMED THE PROCEDURE ON PLAINTIFF WASHINGTON, HE PROSCRIBED PAIN MEDICATION FOR PLAINTIFF TO TAKE. (SEE EXHIBIT K, PAGE 4.).

22. ON AUG. 26, 2020, PLAINTIFF WENT TO AN OFFICE VISIT AT UIC DAVIS HEALTH SYSTEM EYE CENTER, FOR A FOLLOW-UP REFERRED BY DR. YAU, GLENN. (SEE EXHIBIT L, PAGE 1 OF 9).

23. ON SEPT. 17, 2020, GREGORY C. TESLUK, M.D., WROTE A LETTER TO BRITTANY BRIZENDINE, M.D., WITH HIS RECOMMENDATIONS. (SEE EXHIBIT L, PAGE 1 OF 2).

24. ON SEPT. 30, 2020, PLAINTIFF WENT TO AN OFFICE VISIT (Follow UP) AT U.C. DAVIS HEALTH SYSTEM EYE CENTER AND WAS SEEN BY DR. YIU GLENN, OPHTHALMOLOGY. ((SEE EXHIBIT I.) (PAGE 1 OF 8)).

25. ON OCT. 6, 2020, PLAINTIFF WASHINGTON WAS DISCHARGED FROM U.C. DAVIS HEALTH CENTER. (SEE EXHIBIT J. PAGES 1-7).

26. ON OCT. 7, 2020, PLAINTIFF HAD A SURGICAL FOLLOW-UP OFFICE VISIT AT UC DAVIS HEALTH CENTER, CONDUCTED BY ANNIE K. BALK, M.D. (SEE EXHIBIT N.) AND (EXHIBIT O. PAGES 1-13).

27. ON OCT. 14, 2020, PLAINTIFF HAD AN OFFICE VISIT WITH ANNIE K. BALK M.D., AT U.S. DAVIS HEALTH SYSTEM EYE CENTER. REFERRED BY YIU, GLENN, M.D. (SEE EXHIBIT M. PAGES 1-4).

28. ON NOV. 18, 2020, PLAINTIFF HAD AN OFFICE VISIT AT U.C DAVIS H.S.E.C. WITH ANNIE K. BALK, M.D. AND IT WAS NOTED THAT THE SURGERY WENT WELL. (SEE EXHIBIT O. PAGE 1 OF 3).

29. PLAINTIFF WAS PURPOSELY TREATED POORLY AND UNFAIRLY BY DR. MESKATH UDDIN, DEFENDANT, AND HIS NEGLIGENCE COUPLED WITH HIS ACTIONS OF DELIBERATE INDIFFERENCE CAUSED PLAINTIFF TO GO BLIND IN HIS LEFT EYE.

30. DEFENDANT, DR. MESKATH UDDIN M.D., FAILED TO FOLLOW THE INSTRUCTIONS AND RECOMMENDATIONS SUBMITTED BY DR. GREGORY C. TESLUK, AND FAILED TO KEEP PLAINTIFF'S DOCTOR'S APPOINTMENT WITHIN THE (5) DAY PERIOD, WHICH DIRECTLY CONTRIBUTED TO CAUSE PLAINTIFF'S VISION LOSS. (SEE EXHIBITS A. AND B.).

31. CORRECTIONAL OFFICES I. OGGEIDE AND BAUWER, WERE DELIBERATE INDIFFERENCE BY FAILING TO PROTECT PLAINTIFF FROM PHYSICAL HARM AND ASSAULT. WHEN THEY WERE AWARE OF PLAINTIFF'S LIVING SITUATION PRIOR TO ASSAULT.

32. DEFENDANT, JEFF LYNCH, WARDEN, IS SOULY RESPONSIBLE FOR HIS STAFF AT THE PRISON.

33. AT PLAINTIFF'S DOCTOR'S APPOINTMENT, THE DOCTOR INFORMED HIM THAT HIS NEXT PROCEDURE SHOULD BE IN A WEEK, BEFORE DAMAGE SETS IN.

34. AT THE PRISON, AFTER THE PRESSURE WENT UP IN PLAINTIFF'S LEFT EYE, HE CONTINUE TO COMPLAINED ABOUT HIS PAIN TO DEFENDANT M. UDDIN M.D. TO NO AVAIL.

35. FINALLY PLAINTIFF BEGGED DEFENDANT M. UDDIN M.D., TO SEND HIM OUT TO THE EYE CENTER AS AN EMERGENCY WHICH HE REFUSED.

36. AFTER (30 PLUS DAYS) OF AGONIZING PAIN, PLAINTIFF FINALLY GOT THE SURGERY THAT WAS REQUIRED BUT BY THEN IT WAS TOO LATE, HIS VISION WAS ALREADY LOSS.

37. DEFENDANT M. UDDIN, M.D., OVERALL NEGLIGENCE AND UNPROFESSIONAL TREATMENT OF PLAINTIFF'S CARE CONSTITUTE MEDICAL MALPRACTICE.

#### V. EXHAUSTION OF LEGAL REMEDIES

38. PLAINTIFF, HOWARD WASHINGTON, USED THE PRISONER GRIEVANCE PROCEDURE AVAILABLE AT CALIFORNIA STATE PRISON (SAC) TO TRY AND SOLVE THE PROBLEM. (SEE EXHIBIT P. HEALTH CARE GRIEVANCE).

39. ON JULY 13, 2021, PLAINTIFF FILED CDCR 602 (HC) HEALTH CARE GRIEVANCE, TRACKING No. SAC HC 21001009. (SEE EXHIBIT P. SECTION A.)

40. THE CDCR GRIEVANCE WAS RECEIVED AND ACCEPTED BY P. PAKHOMOV TITLE RN ON 7/20/21. AND 9/20/21 WAS THE DUE DATE. (SEE EXHIBIT P. SECTION B.).

41. ON SEPT. 16, 2021, PLAINTIFF RECEIVED INSTITUTIONAL RESPONSE. (SEE EXHIBIT P. SECTION B.).

42. ON SEPT. 25, 2021, PLAINTIFF REFILED MENTIONED CDCR 602 HC TO HEALTH CARE CORRESPONDENCE AND APPEALS BRANCH. (SEE EXHIBIT P. SECTION C.).

43. ON DEC. 28, 2021, THE HEALTH CARE GRIEVANCE APPEAL REVIEW H.P. LEVEL ACCEPTED PLAINTIFF'S APPEAL AND CONDUCTED NO INTERVIEW AND NO INTERVENTION. (SEE EXHIBIT P. SECTION D.) THIS CONCLUDE THE APPEAL PROCESS.



VI. LEGAL CLAIMS

44. PLAINTIFFS REAFFIRM AND INCORPORATE BY REFERENCE PARAGRAPHS 1 - 43 .

45. THE DELIBERATE INDIFFERENCE TO MEDICAL NEEDS AND UNSAFE CONDITIONS VIOLATED PLAINTIFF HOWARD WASHINGTON'S RIGHTS AND CONSTITUTED A DUE PROCESS VIOLATION UNDER THE EIGHTH AMENDMENT TO THE UNITED STATES CONSTITUTION .

46. THE PLAINTIFF HAS NO PLAIN , ADEQUATE OR COMPLETE REMEDY AT LAW TO REDRESS THE WRONGS DESCRIBED HEREIN .

VII. PRAYER FOR RELIEF

WHEREFORE , PLAINTIFF RESPECTFULLY PRAYS THAT THIS COURT ENTER JUDGMENT GRANTING PLAINTIFF :

47. A DECLARATION THAT THE ACTS AND OMISSIONS DESCRIBED HEREIN VIOLATED PLAINTIFF'S RIGHTS UNDER THE CONSTITUTION AND LAWS OF THE UNITED STATES .

48. COMPENSATORY DAMAGES IN THE AMOUNT OF \$ 150,000.00 AGAINST EACH DEFENDANT , JOINTLY AND SEVERALLY .

49. PUNITIVE DAMAGES IN THE AMOUNT OF \$ 150,000.00 AGAINST EACH DEFENDANT .

50. A JURY TRIAL ON ALL ISSUES TRIABLE BY JURY

51. PLAINTIFF'S COSTS IN THIS SUIT

52. ANY ADDITIONAL RELIEF THIS COURT DEEMS JUST , PROPER AND EQUITABLE . 20

DATED : 12-17-22



RESPECTFULLY SUBMITTED

HOWARD WASHINGTON AZ 6407

P.O. Box 290066

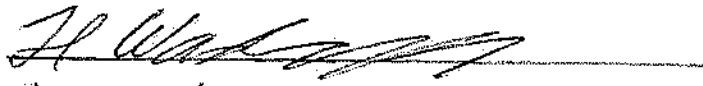
REPRESA CALIF. 95671

VERIFICATION

I HAVE READ THE FOREGOING COMPLAINT AND HEREBY VERIFY THAT  
THE MATTERS ALLEGED THEREIN ARE TRUE, EXCEPT AS TO MATTERS ALLEGED  
ON INFORMATION AND BELIEF, AND, AS TO THOSE, I BELIEVE THEM TO BE TRUE

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS  
TRUE AND CORRECT.

EXECUTED AT REPRESA CALIFORNIA ON <sup>20</sup>12/27/22

  
HOWARD WASHINGTON